

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MATTHEW CONNOLLY and
GAVIN CAMPBELL BLACK,

Defendants.

No. 1:16-cr-00370 (CM)

ECF Case

ORAL ARGUMENT REQUESTED

DECLARATION OF GAVIN CAMPBELL BLACK

Gavin Campbell Black declares as follows pursuant to 28 U.S.C. § 1746:


1. I am a citizen of the United Kingdom and a defendant in the above-captioned proceeding.

2. It is my understanding that the Government may call a witness to testify concerning statements I am claimed to have made in interviews with attorneys at Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul Weiss") on August 25, 2011 and/or June 19, 2012. I understood that Paul Weiss was conducting these interviews as part of an internal investigation as legal counsel for Deutsche Bank. At the time of these interviews, I was employed at Deutsche Bank. I was not represented by counsel at these interviews.

3. As a Deutsche Bank employee at the time of these interviews, I did not believe that I had any choice but to agree to meet with the Paul Weiss lawyers and answer their questions. I believed that, had I refused to do so, it would have resulted in my termination from Deutsche Bank.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on
this 23rd day of April, 2018



Gavin Campbell Black